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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Debra Morales Ruiz, et al.,

Plaintiff,

vs.

Maricopa County of, et al.,

Defendants.

NO. CV-23-02482-PHX-SRB (DMF)

**DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION FOR
RECONSIDERATION**

Defendants Maricopa County, Struble, Crutchfield, Dimas, Hawkins, Hertig, Martin, Montano, Moody, Park, Smith, Chester, Rainey, and Marsland, Magat, Dailey, Espinoza, Jr., Maricopa County Sheriff Jerry Sheridan, and former Maricopa County Sheriff Paul Penzone ("Defendants") by and through undersigned counsel, hereby respond to Plaintiffs' Motion for Reconsideration of Order Partially Granting Defendants' Motion

1 to Dismiss the Second Amended Complaint (“Motion”) (Doc. 50). Defendants respond
 2 to the Motion per the Court’s request. (Doc. 52).

3 Plaintiffs are correct that Maricopa County is the proper party named in a suit
 4 against CHS as CHS is a non-jural entity. Defendants interpret Plaintiffs’ Motion to seek
 5 reconsideration of the Court’s findings related to Count II only and as related only to those
 6 actions of CHS employees, not MCSO employees. While Defendants again assert that
 7 Plaintiff’s Second Amended Complaint fails to state a claim upon which relief can be
 8 granted as it pertains to CHS employees, Defendants agree that the County is the property
 9 in this limited context based on the reasoning provided in the Court’s ruling.

12
 13 **RESPECTFULLY SUBMITTED** this 11th day of September 2025.

14 RACHEL H. MITCHELL
 15 MARICOPA COUNTY ATTORNEY

16 By /s/ Courtney R. Glynn

17 COURTNEY R. GLYNN

18 Deputy County Attorneys
 19 Attorneys for *Maricopa County, Struble,*
 20 *Crutchfield, Dimas, Hawkins, Hertig, Martin,*
 21 *Montano, Moody, Park, Smith, Chester, Rainey,*
 22 *Marsland, Magat, Dailey, Maricopa County*
 23 *Sheriff Jerry Sheridan, and former Maricopa*
 24 *County Sheriff Paul Penzone*

25 **CERTIFICATE OF SERVICE**

26 I hereby certify that on September 11, 2025, I caused the foregoing document to be
 27 electronically transmitted to the Clerk’s Office using the CM/ECF System for filing and
 28 served on counsel of record via the Court’s CM/ECF system.

/s/ R.S. _____

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